



STATE PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT
State/Territory: Michigan

ELIGIBILITY CONDITIONS AND REQUIREMENTS

Programs to Measure and Reduce Inconsistency

The State has in effect the following programs to measure and reduce inconsistency in the application of survey results among surveyors.

Activities typically conducted on a routine or special basis include

- (1) Surveyor attendance at HCFA-sponsored training on various issues related to LTC survey process and interpretations of requirements.
- (2) Monthly in-service training on general or specific issues identified as actual/potential inconsistency areas.
- (3) Upper-level management and quality assurance reviews of all surveys involving specified deficiencies prior to issuance of survey reports.
- (4) Periodic reviews of deficiency data for trends which may indicate significant deviations from national, regional, and state citation rates.
- (5) Special studies of survey processes and deficiency decision-making (e.g., during FY92 the State Survey Agency participated, as one of 10 selected states, in a study of OBRA survey process conducted by ABT Associates under a HCFA contract).
- (6) Analyses, in conjunction with HCFA, of Federal Monitoring Surveys conducted by HCFA surveyors subsequent to State surveys of providers on a sampled basis.
- (7) Informal reconsideration of deficiencies in cases where providers have cause to question validity and encouragement for providers to participate in survey process and exit conference.
- (8) Routine communications/meetings with provider and consumer organizations to discuss possible areas of inconsistency and/or misinterpretations.
- (9) Rotation of team leaders and other surveyors assigned to participate in individual surveys by each licensing unit. Rotation of providers assigned to each licensing unit.
- (10) Participation of quality assurance staff (senior surveyors) in surveys, either in an active surveyor role or as observers.

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(11) Ongoing activities related to consistent interpretations of regulations, through receipt and distribution of HCFA material and by identification of issues needing interpretation and/or clarification by HCFA.

(12) Participation in HCFA Surveyor Minimum Qualifications Test (SMQT).

(13) Participation in periodic provider training programs addressing the LTC requirement and interpretations, with intent of addressing perceived inconsistencies which are due to provider misinterpretations of requirements.

(14) Increased emphasis on proper documentation of deficiencies in survey reports, including use of HCFA "Principles of Documentation" guidelines published in 1992.

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